



January 15, 2018  
Project No. 8128.02.02

Dana Bayuk  
Oregon Department of Environmental Quality  
Northwest Region  
700 NE Multnomah Street, Suite 600  
Portland, Oregon 97232

Re: Monthly Progress Report—December 2017  
Siltronic Corporation  
7200 NW Front Avenue, Portland, OR  
Order No. ECVC-NWR-00-27

Dear Dana:

The Order Requiring Remedial Investigation and Source Control Measures, Oregon Department of Environmental Quality (DEQ) No. ECVC-NWR-00-27, issued by DEQ to Siltronic Corporation (Siltronic) and NW Natural (NWN) on October 4, 2000 (the 2000 Joint Order), requires submittal of monthly progress reports. This progress report encompasses the reporting period spanning December 1, 2017, through December 31, 2017. The next progress report is due February 15, 2018.

Because the 2000 Joint Order and the 2016 Unilateral Order (No. OPSR-NWR-16-02, issued to Siltronic on August 16, 2016 [2016 UAO]) have overlapping requirements on the Siltronic Operable Unit (SOU), Siltronic has previously sought to confirm that the Stormwater Source Control Evaluation (SSCE)<sup>1</sup> work on the SOU met the needs of both the 2000 Joint Order and the 2016 UAO. In a letter dated February 15, 2017, DEQ requested that Siltronic compile all SSCE work into a single work plan. As such, future work related to the SSCE will be provided in this monthly progress report related to the 2000 Joint Order. In doing so, unless DEQ instructs otherwise, Siltronic will proceed under the notion that this reporting regime will concurrently satisfy any overlapping requirements shared between the 2000 Joint Order and the 2016 Unilateral Order concerning activities undertaken on the SOU, while also meeting DEQ's request that the SSCE work be conducted under a single work plan. Therefore, the 2000 Order monthly progress reports will include the SSCE efforts, and those activities related to the Gasco Operable Unit (GOU)—Allen property.

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<sup>1</sup> In a letter dated May 23, 2017, provided by DEQ in response to Siltronic's submittal of its Revised Source Control Evaluation Work Plan, DEQ requested that "future related submittals appropriately reference stormwater source control only." Siltronic is happy to oblige and will hereafter refer to this work as Stormwater Source Control Evaluation (SSCE).

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## **ACTIONS TAKEN UNDER THE 2000 JOINT ORDER SINCE THE PREVIOUS PROGRESS REPORT**

### **Communications and Submittals**

On December 8, Maul Foster & Alongi, Inc. (MFA) submitted a monthly progress report to DEQ for work performed by MFA on behalf of Siltronic in November 2017, pursuant to the 2000 Joint Order.

### **Fieldwork**

On December 4, MFA conducted bimonthly thickness measurements of Portland Gas & Coke (PG&C) waste dense nonaqueous-phase liquid (DNAPL) in WS-15-85, WS-33-81, and WS-43-36.

From December 6 through 22, MFA conducted semiannual monitoring of Siltronic groundwater wells.

On December 28, MFA collected bimonthly soil vapor samples.

On December 29, MFA collected bimonthly combustible-gas measurements.

During December, Siltronic provided access, as necessary, to representatives of NWN for work associated with the NWN source control measures.

## **ACTIONS TO BE TAKEN IN THE NEXT TWO MONTHS**

### **Communications and Submittals**

Siltronic will respond to DEQ's comments from a November 17 letter regarding the groundwater intrusion pathway.

### **Fieldwork**

January field activities will include quarterly water level measurements and data collection from transducers installed in selected monitoring wells.

February field activities will include bimonthly PG&C waste DNAPL liquid thickness measurements at selected wells (WS-15-85, WS-33-81, and WS-43-36); groundwater performance monitoring; bimonthly combustible-gas measurements; and bimonthly vapor sampling.

A sample of stormwater overland flow to CB-67 will be collected by January 31, 2018, as required in the following DEQ letters: the September 27, 2017, comment letter re Overland

Flow Assessment and Groundwater Intrusion Memoranda and the November 17, 2017, letter re Follow-up Comments on Groundwater Intrusion Sampling.

## TEST RESULTS AND DATA RECEIVED

The attached Microsoft® (MS) Excel® data file contains performance and quarterly groundwater monitoring data, as well as the soil vapor data received through the end of the reporting period.

## PROBLEMS EXPERIENCED OR RESOLVED

On December 15, during semiannual monitoring at Siltronic groundwater well WS-33-106, light nonaqueous-phase liquid (LNAPL) was observed on the water level indicator. Before this event, LNAPL had not been detected or measured in this well. No observations regarding the presence or absence of DNAPL could be made because a dedicated bladder pump is lodged in the well casing and cannot be removed.

Please call Michael Murray at (971) 544-2139 if you have any questions or comments regarding the contents of this progress report.

Sincerely,

Maul Foster & Alongi, Inc.



Michael R. Murray, RG, EIT  
Senior Hydrogeologist



Courtney Savoie, RG  
Project Geologist

Attachment/enclosure: MS Excel file (as attachment to the e-mail and on CD with the hard copy)

cc: Myron Burr, Siltronic  
Ilene M. Munk, Foley & Mansfield  
David Rabbino, Jordan Ramis  
Keith Johnson, DEQ  
Paul Siedel, DEQ  
Henning Larsen, DEQ  
Matt McClincy, DEQ  
Eva DeMaria, USEPA  
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John Edwards, Anchor QEA LLC  
John Verduin, Anchor QEA LLC  
Carl Stivers, Anchor QEA LLC  
Ben Hung, Anchor QEA LLC  
John Renda, Anchor QEA LLC  
Jen Mott, Anchor QEA LLC  
Halah Voges, Anchor QEA LLC  
Taku Fuji, Anchor QEA LLC  
Rob Ede, Hahn and Associates, Inc.

# ATTACHMENT

MS EXCEL FILE

